

General Conformity Determination Briefing Paper Options (NPL Project in Upper Green River Basin – UGRB - Ozone Nonattainment Area)

If general conformity is applicable (i.e. emissions are above de minimis and/or activities are not exempt or presumed to conform). There are six basic methods that EPA identifies for demonstrating general conformity.

Ex. 5 - Deliberative Process

Method	Description	Feasibility for UGRB
1	BLM relies on a commitment from the Governor to include the project emissions in a future SIP revision (i.e. Redesignation and Maintenance Plan SIP revision)	Ex. 5 - Deliberative Process
2	BLM mitigates or offsets the increase in emissions caused by the project.	
3	BLM document that the emissions from the action are identified and accounted for in the existing State Implementation Plan (SIP).	
4	BLM obtains a statement from WDEQ that the project's emissions, along with all other emissions in the area, do not exceed the budget for those emissions in an existing SIP.	
5	Have the local Metropolitan Planning Organization (MPO) provide a statement that the emissions are included in transportation plan modeling.	
6	Conduct air quality modeling to demonstrate that the emissions will not cause or contribute to a violation of the applicable NAAQS.	

****In addition to the methods outlined in the table, there is also a possibility of BLM reducing pace of development in order to stay under de minimis levels. See details below****

Details of Feasible Methods

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The definition assures the offsets in the various CAA programs are calculated and used consistently. All offsets must meet the following requirements:

- Quantifiable
- Consistent with the applicable SIP attainment demonstration (if applicable)³
- Surplus to reductions required by, and credited to, other applicable SIP provisions
- Enforceable at both the State and Federal levels; and
- Permanent within the timeframe specified by the program.

Pace of Development Option: Perhaps consider reducing the annual level of development (reduce the number of wells drilled) so as to remain below the NO_x and VOCs *de minimis* levels.⁴

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³ Given there is no SIP in place for this area, we can probably determine that the State has wider flexibility with the form of the commitment. Since there is nothing they are revising, they probably will not have to identify the specific measures they will take, but could instead generally commit to including these emissions in the SIP revision they may submit, including whatever measures are necessary to do so

⁴ Slowing the pace of development was analyzed and included in the early NEPA analyses for this area.

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